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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**SIRI DIAZ, CAROLYN SIEGEL, TALIA BUMB,
BLERTA VIKKI, DANIELLE OWIMRIN, SUSAN
LEVIN, on behalf of themselves and all others
similarly situated,**

Plaintiffs,

-against-

**SCORES HOLDING COMPANY, INC.; GO WEST
ENTERTAINMENT, INC. a/k/a SCORES WEST
SIDE; and SCORES ENTERTAINMENT, INC.,
a/k/a SCORES EAST SIDE.; ENTERTAINMENT
MANAGEMENT SERVICES, INC.; and 333 EAST
60th STREET, INC. a/k/a SCORES EAST SIDE.**

Defendants.

No. 07 Civ. 8718 (RMB)

**PLAINTIFFS' MOTION FOR CONDITIONAL
CERTIFICATION AND COURT-AUTHORIZED
NOTICE PURSUANT TO SECTION 216(b) OF THE FLSA**

PLEASE TAKE NOTICE that:

Representative Plaintiffs (“Plaintiffs”) Siri Diaz, Carolyn Siegel, Talia Bumb, Blerta Vikki, Danielle Owimrin and Susan Levin hereby move this Court, before the Honorable Richard M. Berman, 500 Pearl Street, Room 650, for a determination that notice be sent, pursuant to 29 U.S.C. § 216(b), to all similarly situated employees that they may opt into this action should they wish to assert claims under the Fair Labor Standards Act, 29 U.S. C. § 201 *et seq.* Plaintiffs propose that the notice be written, in a form approved by the Court, after further consultation with all parties.

In support of this Motion, plaintiffs rely on the pleadings and documents filed with this Motion, including:

- Plaintiffs’ Memorandum of Law in Support of Plaintiffs’ Motion for Conditional Certification and Court-Authorized Notice Pursuant to Section 216(b) of the FLSA
- the Declaration of Tammy Marzigliano which attaches the declarations of all Plaintiffs, excerpts from the deposition transcripts of three Plaintiffs and two of Defendants’ employees;

In addition to the pleadings and documents filed herewith, Plaintiffs also will rely on the entire record in this action, such further pleadings and documents as may be filed, and oral argument as the Court may permit or require.

Dated: March 28, 2008
New York, New York

Respectfully submitted,
OUTTEN & GOLDEN LLP
By:

/s/ Justin Swartz
Justin M. Swartz (JS 7989)

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**Attorneys for Plaintiffs and the Putative
Class**